

# Thomas-Jensen Affirmation

Exhibit # 68

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF NEW YORK; et al.,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as President of the United States; et al.,

Defendants.

C.A. No. 1:25-cv-00039-JJM-PAS

**DECLARATION OF CARNITRA D. WHITE**

I, Carnitra D. White, declare as follows:

1. I am a resident of the State of Maryland. I am over the age of 18 and have personal knowledge of all the facts stated herein, except to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by the Maryland Department of Human Services (the “Department”). From February 22, 2023 through the present, I serve as Principal Deputy Secretary of the Department. On January 21, 2025, I was designated the acting secretary.

3. The Department is the executive agency responsible for coordinating and directing social services, including child welfare and adult services, public assistance programs, and child support services throughout the State of Maryland. It comprises the Social Services

Administration (“SSA”), the Family Investment Administration (“FIA”), and the Child Support Administration (“CSA”), in addition to several other offices and entities.

4. SSA programs include child welfare services such as child protective services (investigations of abuse and neglect) and out-of-home care (foster care); support services for parents whose children are at risk for placement in foster care; reunification services for parents whose children have been placed in foster care; a kinship care program to facilitate placement of children with kin whenever possible; adoption services; respite care services; adult protective services; and in-home aide services.

5. FIA programs encompass public assistance, including the Supplemental Nutrition Program or SNAP (food stamps) and temporary cash assistance; temporary disability assistance; emergency assistance to families with children; refugee assistance; burial assistance; energy assistance; housing assistance; and workforce programs to transition individuals from public assistance to self-sufficiency.

6. CSA oversees local child support and paternity establishment and provides child support enforcement through various tools, including withholding wages, intercepting tax refunds, requesting suspension of driver’s licenses and professional licenses, and preventing the issuance of passports.

7. As Principal Deputy Secretary of the Department, I am generally familiar with the purpose of the Department’s programs, the critical need for such programs, and the extent to which the Department’s programs are dependent on federal funding. In my official capacity, I also have access to specific information regarding the sources, types, and dollar amounts of federal funding the Department has received and anticipates receiving in FY2025.

8. The Department has been awarded a federal grant, authorized by the Refugee Resettlement Program (45 C.F.R. 400, *et seq.*) and Refugee Act of 1980 (8 U.S.C. § 1521, *et seq.*), in excess of \$100 million for its Refugee Assistance Program. The Department anticipates drawing down \$9,316,000 in federal Refugee Resettlement funds on March 28, 2025. Any interruption in receipt of these federal funds likely will impact the Department's ability to serve vulnerable refugees through our executed agreements with Maryland's refugee resettlement agencies.

9. The Department receives substantial federal funding from the U.S. Department of Health and Human Services, Administration for Children and Families, to support its child welfare programs. These funds are used for the protection of children who have been victims of abuse and neglect, including for the following categories of services: child welfare services to families and children to prevent abuse and neglect and strengthen and preserve families; the care of children who must be separated from their families for their protection; services to reunify children with their parents; services to provide permanency and stability for children who cannot be reunified with their parents; and for child welfare training. These funds are authorized by a number of different federal statutes (Titles IV-E and IV-B of the Social Security Act, 42 U.S.C. § 670, *et seq.*; the Child Abuse Prevention and Treatment Act, 42 U.S.C. § 5101, *et seq.*).

10. The Department's authorized amount in federal child welfare funds for federal FY 2025 is approximately \$70 million. The Department anticipates receiving \$21,085,000 on April 30, 2025. Any interruption in the receipt of these funds likely will impact the Department's ability to serve child victims of abuse and neglect and foster children and their families.

11. The Department receives substantial federal funding from the U.S. Department of Health and Human Services, Administration for Children and Families, Office of Child Support

Enforcement (“OCSE”), pursuant to 42 U.S.C. § 651, *et seq.*, to support its child support establishment and enforcement activities. The Department’s authorized amount of OCSE funds for federal FY 2025 is approximately \$72 million. The Department anticipates receiving \$5,596,000 from OCSE on March 28, 2025. Any interruption in the receipt of these funds likely will impact the Department’s ability to establish and enforce child support orders and could result in depriving Maryland children of financial support critical to their care and place those children at risk of poverty.

12. The Department receives federal funding from the U.S. Department of Health and Human Services, Administration for Children and Families, to support its Adult Guardianship program. The program provides for care and protection of disabled adults who lack the capacity to care for themselves and family who are willing and able to provide that care. The Department anticipates receiving \$746,000 in federal adult guardianship funds on April 1, 2025. Any interruption in receipt of these funds could impact the functioning of the Department’s Adult Guardianship program.

13. The Department receives significant federal funding in Community Services and Social Services block grants from the U.S. Department of Health and Human Services, Administration for Children and Families. These funds are used for a wide range of community and social services, including the prevention and remedying of child abuse and neglect; the prevention and remedying of abuse, neglect, and exploitation of vulnerable adults; foster care services for children; foster care services for disabled adults; and the reduction of institutional care for children. The Department’s authorized amount for this block grant funding for federal FY 2025 is approximately \$29 million. The Department anticipates receiving \$6,528,000 in funding on April 30, 2025. Any interruption in receipt of these funds likely will impact the

Department's ability to provide core services to its most vulnerable residents, children and disabled adults.

14. The Department receives federal funding from the U.S. Department of Health and Human Services, Administration for Children and Families, in support of its Office of Home Energy Programs ("OHEP") through the federal Low Income Home Energy Assistance Program which is authorized by the Energy Policy Act of 2005 and is codified at 42 U.S.C. §§ 8621-8630. OHEP provides financial assistance to low-income households by making payments to fuel suppliers and utility companies on the customer's behalf. The program also makes referrals for weatherization and energy efficiency services that can help lower utility bills and make homes more comfortable. The Department's authorized amount of OHEP funds for federal FY 2025 is approximately \$84 million. The Department anticipates receiving \$39,400,000 in federal funding between March and April 2025. Any interruption in receipt of these funds likely will impact the Department's ability to assist individuals and families at risk of having their utilities interrupted.

15. The Department, along with the Maryland Department of Health, receives significant federal funding for the maintenance of MDTHINK, Maryland's cloud-based platform for the delivery and tracking of human services. The sources for these federal funds are from the U.S. Department of Agriculture, Supplemental Nutrition Assistance Program (7 U.S.C. § 2011, *et seq.*); the U.S. Department of Health and Human Services' Administration for Children and Families (Title IV-E administrative funds); and the U.S. Department of Health and Human Services' Centers for Medicare & Medicaid Services. The State's authorized amount of federal funds for MDTHINK for federal FY 2025 is \$129 million. The State anticipates receiving \$15,375,000 in federal funds for MDTHINK on April 1, 2025. Any interruption in receipt of

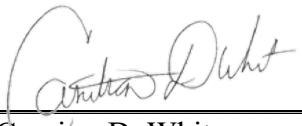
these funds could critically impact the functioning of the State's cloud-based platform for the operation of its human services programs, including federal benefit eligibility and vital records information technology systems.

16. The combined fiscal impact is easily in excess of \$92 million alone for anticipated federal funds in March - April 2025. The Department depends on the allocated federal funds to deliver critical services to Maryland's most vulnerable residents so that they can put food on the table, keep the lights on, and keep their homes warm in winter. Federal funds ensure we meet our contractual obligations to vendors who serve our customers.

17. Without the allocated refugee assistance funds, the Department will be significantly impaired in its ability to assist refugees who are present in Maryland, and who rely on these funds as they rebuild their lives in the United States. Without the allocated federal child support funds, an unknown number of Maryland children will experience delays in the establishment and enforcement of child support orders that may place them at risk of poverty or drive families deeper into poverty. Without the allocated federal energy assistance funds, the Department will lack sufficient resources to assist Marylanders whose electricity or heat will be shut off. Without the allocated federal child welfare funds, the Maryland child welfare system will not be able to adequately prevent and address child abuse and neglect resulting in childhood and parental trauma that may permanently affect the health and well-being of an unknown number of Marylanders and may even result in death. Without the allocated adult services funds, an unknown number of vulnerable adults similarly will be placed at material risk of serious harm.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 5, 2025, at Baltimore, Maryland.

  
Carnitra D. White  
Carnitra D. White